

UNITED STATES DISTRICT COURT
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2

v.

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 846

21 U.S.C. § 853

JOSE ERASMO CRUZ-MARTINEZ,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy - Methamphetamine)

From in or about May 2021 through on or about June 4, 2021, in the State and District of Minnesota and elsewhere, the defendant,

JOSE ERASMO CRUZ-MARTINEZ,

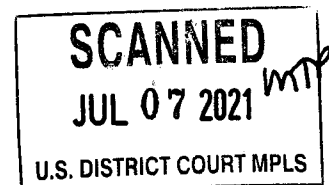
unlawfully, knowingly and intentionally conspired with others, known and unknown to the grand jury, to distribute and possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

COUNT 2

(Distribution - Methamphetamine)

On or about May 17, 2021, in the State and District of Minnesota, the defendant,

JOSE ERASMO CRUZ-MARTINEZ,



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unlawfully, knowingly and intentionally distributed five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 3

(Distribution - Methamphetamine)

On or about May 25, 2021, in the State and District of Minnesota, the defendant,

JOSE ERASMO CRUZ-MARTINEZ,

unlawfully, knowingly and intentionally distributed fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 4

(PWID - Methamphetamine)

On or about June 4, 2021, in the State and District of Minnesota, the defendant,

JOSE ERASMO CRUZ-MARTINEZ,

aiding and abetting and being aided and abetted by others, known and unknown to the grand jury, unlawfully, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance; all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

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COUNT 5
(PWID - Methamphetamine)

On or about June 4, 2021, in the State and District of Minnesota, the defendant,

JOSE ERASMO CRUZ-MARTINEZ,

aiding and abetting and being aided and abetted by others, known and unknown to the grand jury, unlawfully, knowingly and intentionally possessed with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance; all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

FORFEITURE ALLEGATIONS

Upon conviction of any Count of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any and all property that was used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations. The property subject to forfeiture includes, but is not limited to, the following:

1. \$20,000 in U.S. Currency seized from 13th Avenue South, Minneapolis, Minnesota on June 4, 2021.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

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A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON